

EXHIBIT A



January 17, 2018

Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

VIA EMAIL AND U.S. MAIL

David W. Hodges
Kennedy Hodges, L.L.P.
4409 Montrose Blvd, Ste 200
Houston, TX, 77006
mtg@kennedyhodges.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Harms et al v. 3M Company et al Case No.: 0:17-cv-02894-JNE-FLN

Dear Counsel:

We are in receipt of the second amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The second amended PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original and/or any amended PFS. An updated verification is required, however, to be served along with the amended PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Title "Harms_Bobby_17-cv-2114_1"

PLAINTIFFS' LAST NAME - Harms
PLAINTIFFS' FIRST NAME - Bobby
CASE NO. - 0:17-cv-02114
SECTION I (CASE INFORMATION) -
SECTION II (PERSONAL INFORMATION) - Incomplete
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 06, 08, 09, 10, 11, 12, 13, 14, 15, 16
SECTION III (SURGERY INFORMATION) - Incomplete
SECTION II - INCOMPLETE QUESTIONS - 03
SECTION IV - 1 (VITAL STATISTICS) - Incomplete
SECTION IV - 10 (DRUG/ALCOHOL) - Incomplete
SECTION IV - 3 (HEALTHCARE PROVIDERS) -
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete
SECTION IV - 9 (TOBACCO) - Incomplete
SECTION IX - 1 (CONSORTIUM NAME ETC.) - Incomplete
SECTION IX - 3 (RESIDENCES) - Incomplete
SECTION IX - 4 (MARRIED) - Incomplete
SECTION V - 5 (DISABILITY CLAIMS) - Incomplete
SECTION V - 6 (LAWSUITS) -
SECTION V - 7 (BANKRUPTCY) -
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete
SECTION VI - 6 (WARNINGS) -
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -
SECTION VI - 8 (3M/ARIZANT WARRANTY) -
SECTION VI - 9 (AUGUSTINE) -
SECTION VII - 1 (LOST PAST WAGES) - Incomplete
SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete
SECTION VIII - 2 (VERBAL/Written STATEMENT) - Incomplete
X.01 - SIGNED AUTHORIZATION - Incomplete
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Kennedy Hodges, L.L.P.
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - mtg@kennedyhodges.com



February 05, 2018

Benjamin W. Hulse
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E-Mail: bhulse@blackwellburke.com

VIA EMAIL AND U.S. MAIL

David W. Hodges
Kennedy Hodges, L.L.P.
4409 Montrose Blvd, Ste 200
Houston, TX, 77006
mtg@kennedyhodges.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Duran v. 3M Company et al Case No.: 0:17-cv-02534-JNE-FLN

Dear Counsel:

We are in receipt of the second amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The second amended PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original and/or any amended PFS. An updated verification is required, however, to be served along with the amended PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Title "Duran_Connie_017-cv-02534_1_Duran_Connie_017-cv-02534_1"

Duran_Connie_017-
cv-
02534_1_Duran_Conni
e_017-cv-02534_1

PLAINTIFFS' LAST NAME - Duran
PLAINTIFFS' FIRST NAME - Connie
CASE NO. - 0:17-cv-02534
SECTION I (CASE INFORMATION) -
SECTION II (PERSONAL INFORMATION) - Incomplete
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 06, 08, 09, 10
SECTION III (SURGERY INFORMATION) -
SECTION IV - 1 (VITAL STATISTICS) - Incomplete
SECTION IV - 10 (DRUG/ALCOHOL) -
SECTION IV - 3 (HEALTHCARE PROVIDERS) -
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete
SECTION IV - 9 (TOBACCO) -
SECTION IX - 1 (CONSORTIUM NAME ETC.) -
SECTION IX - 3 (RESIDENCES) -
SECTION IX - 4 (MARRIED) -
SECTION V - 5 (DISABILITY CLAIMS) -
SECTION V - 6 (LAWSUITS) -
SECTION V - 7 (BANKRUPTCY) -
SECTION VI - 1 (PHYSICAL INJURY) -
SECTION VI - 3 (EMOTIONAL DISTRESS) -
SECTION VI - 6 (WARNINGS) -
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -
SECTION VI - 8 (3M/ARIZANT WARRANTY) -
SECTION VI - 9 (AUGUSTINE) -
SECTION VII - 1 (LOST PAST WAGES) -
SECTION VII - 2 (LOST FUTURE WAGES) -
SECTION VIII - 2 (VERBAL/WITTEN STATEMENT) - Incomplete
X.01 - SIGNED AUTHORIZATION - Incomplete
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Kennedy Hodges
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - mtg@kennedyhodes.com



Benjamin W. Hulse
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January 11, 2018

VIA EMAIL AND U.S. MAIL

Benjamin Paul Mouton
McGlynn, Glisson and Mouton
340 Florida St.
Baton Rouge, LA 70821-1909
ben@mcglynnglisson.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Aker v. 3M Company et al Case No.: 0:17-cv-03496-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Title "Aker_Mary_17-cv-03496_1_Aker_Mary_17-cv-03496_1"

PLAINTIFFS' LAST NAME - Aker
PLAINTIFFS' FIRST NAME - Mary
CASE NO. - 17-cv-03496
SECTION I (CASE INFORMATION) -
SECTION II (PERSONAL INFORMATION) - Incomplete
SECTION II - INCOMPLETE QUESTIONS – 01, 02, 03, 06, 08, 09, 10, 11, 12, 13
SECTION III (SURGERY INFORMATION) – Incomplete
SECTION III - INCOMPLETE QUESTIONS - 03
SECTION IV - 1 (VITAL STATISTICS) - Incomplete
SECTION IV - 10 (DRUG/ALCOHOL) -
SECTION IV - 3 (HEALTHCARE PROVIDERS) -
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete
SECTION IV - 9 (TOBACCO) - Incomplete
SECTION IX - 1 (CONSORTIUM NAME ETC.) - Incomplete
SECTION IX - 3 (RESIDENCES) - Incomplete
SECTION IX - 4 (MARRIED) - Incomplete
SECTION V - 5 (DISABILITY CLAIMS) - Incomplete
SECTION V - 6 (LAWSUITS) - Incomplete
SECTION V - 7 (BANKRUPTCY) - Incomplete
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete
SECTION VI - 6 (WARNINGS) -
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -
SECTION VI - 8 (3M/ARIZANT WARRANTY) -
SECTION VI - 9 (AUGUSTINE) -
SECTION VII - 1 (LOST PAST WAGES) - Incomplete
SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) - Incomplete
X.01 - SIGNED AUTHORIZATION - Incomplete
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - McGlynn, Glisson
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - ben@mcglynnnglisson.com



Benjamin W. Hulse
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January 30, 2018

VIA EMAIL AND U.S. MAIL

Kristine K. Kraft
Schlichter Bogard & Denton, LLP
100 S. Fourth Street, Suite 1200
St. Louis, MO 63102

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Jackson v. 3M Company et al Case No.: 0:17-cv-03747-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Title "Jackson_Deloise_17-cv-03747_1_Jackson_Deloise_17-cv-03747_1"

Jackson_Deloise_17-
cv-
03747_1_Jackson_Del
oise_17-cv-03747_1

PLAINTIFFS' LAST NAME - Jackson
PLAINTIFFS' FIRST NAME - Deloise
CASE NO. - 17-cv-03747
SECTION I (CASE INFORMATION) -
SECTION II (PERSONAL INFORMATION) - Incomplete
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 06, 07, 08
SECTION III (SURGERY INFORMATION) -
SECTION IV - 1 (VITAL STATISTICS) -
SECTION IV - 10 (DRUG/ALCOHOL) -
SECTION IV - 3 (HEALTHCARE PROVIDERS) -
SECTION IV - 7 (PHARMACIES/DRUGSTORES) -
SECTION IV - 8 (DENTAL PROCEDURES) -
SECTION IV - 9 (TOBACCO) -
SECTION IX - 1 (CONSORTIUM NAME ETC.) -
SECTION IX - 3 (RESIDENCES) -
SECTION IX - 4 (MARRIED) -
SECTION V - 5 (DISABILITY CLAIMS) -
SECTION V - 6 (LAWSUITS) -
SECTION V - 7 (BANKRUPTCY) -
SECTION VI - 1 (PHYSICAL INJURY) -
SECTION VI - 3 (EMOTIONAL DISTRESS) -
SECTION VI - 6 (WARNINGS) -
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -
SECTION VI - 8 (3M/ARIZANT WARRANTY) -
SECTION VI - 9 (AUGUSTINE) -
SECTION VII - 1 (LOST PAST WAGES) -
SECTION VII - 2 (LOST FUTURE WAGES) -
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) -
X.01 - SIGNED AUTHORIZATION - Incomplete
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Schlichter Bogard
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - rharris@uselaws.com



Benjamin W. Hulse
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E-Mail: bhulse@blackwellburke.com

February 05, 2018

VIA EMAIL AND U.S. MAIL

David W. Hodges
Kennedy Hodges, L.L.P.
4409 Montrose Blvd, Ste 200
Houston, TX, 77006
mtg.kennedyhodges.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Boughner v. 3M Company et al Case No.: 0:17-cv-03848-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Title "Boughner_Roland_017-cv-03848_1_Boughner_Roland_017-cv-03848_1"

Boughner_Roland_01
7-cv-
03848_1_Boughner_R
oland_017-cv-03848_1

PLAINTIFFS' LAST NAME - Boughner
PLAINTIFFS' FIRST NAME - Roland
CASE NO. - 0:17-cv-03848
SECTION I (CASE INFORMATION) -
SECTION II (PERSONAL INFORMATION) - Incomplete
SECTION II - INCOMPLETE QUESTIONS - 02, 08, 09, 10
SECTION III (SURGERY INFORMATION) -
SECTION IV - 1 (VITAL STATISTICS) -
SECTION IV - 10 (DRUG/ALCOHOL) -
SECTION IV - 3 (HEALTHCARE PROVIDERS) -
SECTION IV - 7 (PHARMACIES/DRUGSTORES) -
SECTION IV - 8 (DENTAL PROCEDURES) -
SECTION IV - 9 (TOBACCO) -
SECTION IX - 1 (CONSORTIUM NAME ETC.) -
SECTION IX - 3 (RESIDENCES) -
SECTION IX - 4 (MARRIED) -
SECTION V - 5 (DISABILITY CLAIMS) -
SECTION V - 6 (LAWSUITS) -
SECTION V - 7 (BANKRUPTCY) -
SECTION VI - 1 (PHYSICAL INJURY) -
SECTION VI - 3 (EMOTIONAL DISTRESS) -
SECTION VI - 6 (WARNINGS) -
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -
SECTION VI - 8 (3M/ARIZANT WARRANTY) -
SECTION VI - 9 (AUGUSTINE) -
SECTION VII - 1 (LOST PAST WAGES) -
SECTION VII - 2 (LOST FUTURE WAGES) -
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) -
X.01 - SIGNED AUTHORIZATION -
X.02.D - DOCUMENTS - SIGNED VERIFICATION -
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Kennedy Hodges, L.L.P.
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - mtg@kennedyhodges.com



Benjamin W. Hulse
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January 30, 2018

VIA EMAIL AND U.S. MAIL

Amanda M. Williams
Gustafson Gluek PLLC
120 South Sixth Street, Suite 2600
Minneapolis, MN 55402
awilliams@gustafsongluek.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Echard et al v. 3M Company et al Case No.: 0:17-cv-04537-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

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Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Title "Echard_Audrey _17-cv-04537_1_Echard_Audrey _17-cv-04537_1"

Echard_Audrey _17-
cv-
04537_1_Echard_Audr
ey _17-cv-04537_1

PLAINTIFFS' LAST NAME - Echard
PLAINTIFFS' FIRST NAME - Audrey
CASE NO. - 17-cv-04537
SECTION I (CASE INFORMATION) -
SECTION II (PERSONAL INFORMATION) - Incomplete
SECTION II - INCOMPLETE QUESTIONS - 01, 02, 03, 05, 06, 07, 08, 09, 10
SECTION III (SURGERY INFORMATION) - Incomplete
SECTION III - INCOMPLETE QUESTIONS - 03, 04, 05
SECTION IV - 1 (VITAL STATISTICS) - Incomplete
SECTION IV - 10 (DRUG/ALCOHOL) - Incomplete
SECTION IV - 3 (HEALTHCARE PROVIDERS) -
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete
SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete
SECTION IV - 9 (TOBACCO) - Incomplete
SECTION IX - 1 (CONSORTIUM NAME ETC.) - Incomplete
SECTION IX - 3 (RESIDENCES) - Incomplete
SECTION IX - 4 (MARRIED) - Incomplete
SECTION V - 5 (DISABILITY CLAIMS) - Incomplete
SECTION V - 6 (LAWSUITS) - Incomplete
SECTION V - 7 (BANKRUPTCY) - Incomplete
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete
SECTION VI - 6 (WARNINGS) - Incomplete
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) - Incomplete
SECTION VI - 8 (3M/ARIZANT WARRANTY) - Incomplete
SECTION VI - 9 (AUGUSTINE) - Incomplete
SECTION VII - 1 (LOST PAST WAGES) - Incomplete
SECTION VII - 2 (LOST FUTURE WAGES) - Incomplete
SECTION VIII - 2 (VERBAL/Written STATEMENT) - Incomplete
X.01 - SIGNED AUTHORIZATION - Incomplete
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Gustafson Gluek PLLC
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - awilliams@gustafsongluek.com



Benjamin W. Hulse
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February 05, 2018

VIA EMAIL AND U.S. MAIL

Jason C. Webster
The Webster Law Firm
6200 Savoy Suite 150
Houston, TX 77036
www.thewebsterlawfirm.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Guobadia, Maxine v. 3M Company et al Case No.: 0:17-cv-04623-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

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Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Title "Guobadia_Maxine_017-cv-04623_1_Guobadia_Maxine_017-cv-04623_1"

Guobadia_Maxine_017
-cv-
04623_1_Guobadia_M
axine_017-cv-04623_1

PLAINTIFFS' LAST NAME - Guobadia
PLAINTIFFS' FIRST NAME - Maxine
CASE NO. - 0:17-cv-04623
SECTION I (CASE INFORMATION) -
SECTION II (PERSONAL INFORMATION) - Incomplete
SECTION II - INCOMPLETE QUESTIONS - 13
SECTION III (SURGERY INFORMATION) - Incomplete
SECTION II - INCOMPLETE QUESTIONS - 01
SECTION IV - 1 (VITAL STATISTICS) -
SECTION IV - 10 (DRUG/ALCOHOL) -
SECTION IV - 3 (HEALTHCARE PROVIDERS) - Incomplete
SECTION IV - 7 (PHARMACIES/DRUGSTORES) - Incomplete
SECTION IV - 8 (DENTAL PROCEDURES) -
SECTION IV - 9 (TOBACCO) -
SECTION IX - 1 (CONSORTIUM NAME ETC.) -
SECTION IX - 3 (RESIDENCES) -
SECTION IX - 4 (MARRIED) -
SECTION V - 5 (DISABILITY CLAIMS) - Incomplete
SECTION V - 6 (LAWSUITS) -
SECTION V - 7 (BANKRUPTCY) -
SECTION VI - 1 (PHYSICAL INJURY) - Incomplete
SECTION VI - 3 (EMOTIONAL DISTRESS) -
SECTION VI - 6 (WARNINGS) -
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -
SECTION VI - 8 (3M/ARIZANT WARRANTY) -
SECTION VI - 9 (AUGUSTINE) -
SECTION VII - 1 (LOST PAST WAGES) -
SECTION VII - 2 (LOST FUTURE WAGES) -
SECTION VIII - 2 (VERBAL/Written STATEMENT) -
X.01 - SIGNED AUTHORIZATION -
X.02.D - DOCUMENTS - SIGNED VERIFICATION -
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Webster Law
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - filing@thewebsterlawfirm.com

EXHIBIT B



February 02, 2018

Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

VIA EMAIL AND U.S. MAIL

Todd N. Hendrickson
Hendrickson Law
12180 Old Big Bend Road
Kirkwood, MO 63122
todd@hendricksonlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Six Case No.: 17-v-01494-JNE-FLN

Dear Counsel:

We are in receipt of the second amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The second amended PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original and/or any amended PFS. An updated verification is required, however, to be served along with the amended PFS.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Title "Six_John __1_Six_John_-cv-_1"

Six_John
__1_Six_John_-cv-_1

PLAINTIFFS' LAST NAME - Six
PLAINTIFFS' FIRST NAME - John T.
CASE NO. - 0:17-cv-01494
SECTION I (CASE INFORMATION) -
SECTION II (PERSONAL INFORMATION) -
SECTION III (SURGERY INFORMATION) - Incomplete
SECTION III - INCOMPLETE QUESTIONS - 03
SECTION IV - 1 (VITAL STATISTICS) -
SECTION IV - 10 (DRUG/ALCOHOL) -
SECTION IV - 3 (HEALTHCARE PROVIDERS) -
SECTION IV - 7 (PHARMACIES/DRUGSTORES) -
SECTION IV - 8 (DENTAL PROCEDURES) -
SECTION IV - 9 (TOBACCO) -
SECTION IX - 1 (CONSORTIUM NAME ETC.) -
SECTION IX - 3 (RESIDENCES) -
SECTION IX - 4 (MARRIED) -
SECTION V - 5 (DISABILITY CLAIMS) -
SECTION V - 6 (LAWSUITS) -
SECTION V - 7 (BANKRUPTCY) -
SECTION VI - 1 (PHYSICAL INJURY) -
SECTION VI - 3 (EMOTIONAL DISTRESS) - Incomplete
SECTION VI - 6 (WARNINGS) -
SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -
SECTION VI - 8 (3M/ARIZANT WARRANTY) -
SECTION VI - 9 (AUGUSTINE) -
SECTION VII - 1 (LOST PAST WAGES) -
SECTION VII - 2 (LOST FUTURE WAGES) -
SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) -
X.01 - SIGNED AUTHORIZATION -
X.02.D - DOCUMENTS - SIGNED VERIFICATION - Incomplete
I.03.B - PLAINTIFFS' COUNSEL'S FIRM - Todd N. Hendrickson, P.C.
I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - tnhlawyer@gmail.com

EXHIBIT C

From: Ben Hulse

Sent: Friday, March 09, 2018 3:47 PM

To: JoanEricksen_Chambers@mnd.uscourts.gov; noel_chambers@mnd.uscourts.gov

Cc: Jerry Blackwell <blackwell@blackwellburke.com>; Jan Conlin <JMC@ciresiconlin.com>; Ben Gordon <bgordon@levinlaw.com>; David Szerlag <david@pritzkerlaw.com>; Genevieve Zimmerman <gzimmerman@meshbesh.com>; Bridget Ahmann <Bridget.Ahmann@FaegreBD.com>; Mary Young <myoung@blackwellburke.com>

Subject: MDL 2666 - Bair Hugger - Defendants' Lists re: PFS Disputes

Dear Judge Ericksen and Judge Noel,

Attached are Defendants' three lists related to Plaintiff Fact Sheets, which are discussed in Section 2 of the parties' forthcoming Joint Status Report.

The parties have conferred and would like to submit the Joint Status Report on Monday, following the motions hearing with Judge Noel, as the hearing may inform the issues to be raised at Thursday's status conference.

Sincerely,

Ben Hulse

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Defendants' PFS List 1: Overdue Plaintiff Fact Sheets
(Updated March 09, 2018)

Case Number	Title	Date Filed	Due Date	Comments	Prior Listing	Firm Name
<u>0:17-cv-04431-JNE-FLN</u>	Slaughter, Shirley v. 3M Company et al	9/27/2017	12/26/2017	Active	12/15/2017 01/08/2018 02/06/2018	Kirtland and Packard LLP
<u>0:17-cv-04500-JNE-FLN</u>	Hammel-Fogleboch v. 3M Company et al	9/29/2017	12/28/2017	Active	1/8/2018 02/06/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-04515-JNE-FLN</u>	Horn, Warren v. 3M Company et al	10/3/2017	1/1/2018	Active	1/8/2018 02/06/2018	Bernstein Liebhard LLP
<u>0:17-cv-04519-JNE-FLN</u>	Williams, Janice v. 3M Company et al	10/3/2017	1/1/2018	Active	1/8/2018 02/06/2018	Bernstein Liebhard LLP
<u>0:17-cv-04637-JNE-FLN</u>	Mackey, Carolyn v. 3M Company et al	10/11/2017	1/9/2018	Active	2/6/2018	Bernstein Liebhard LLP
<u>0:17-cv-04642-JNE-FLN</u>	Smith, Diana et al v. 3M Company et al	10/11/2017	1/9/2018	Active	2/6/2018	The Miller Firm, LLC
<u>0:17-cv-04652-JNE-FLN</u>	Leaf, Loretta v. 3M Company et al	10/11/2017	1/9/2018	Active	2/6/2018	Kirtland & Packard LLP
<u>0:17-cv-04651-JNE-FLN</u>	Knight, Kyle v. 3M Company et al	10/11/2017	1/9/2018	Active	2/6/2018	Kirtland & Packard LLP
<u>0:17-cv-04764-JNE-FLN</u>	Bewley, Macil v. 3M Company et al	10/20/2017	1/18/2018	Active	2/6/2018	Kirtland and Packard LLP
<u>0:17-cv-04775-JNE-FLN</u>	Reinhardt, Rhonda v. 3M Company et al	10/23/2017	1/21/2018	Active	2/6/2018	Bernstein Liebhard LLP
<u>0:17-cv-04778-JNE-FLN</u>	Brown, Ina v. 3M Company et al.	10/23/2017	1/21/2018	Active	2/6/2018	Bernstein Liebhard LLP
<u>0:17-cv-04881-JNE-FLN</u>	Potter, Karen v. 3M Company et al	10/26/2017	1/24/2018	Active	2/6/2018	Bernstein Liebhard LLP
<u>0:17-cv-04885-JNE-FLN</u>	McEvoy, Mark v. 3M Company	10/26/2017	1/24/2018	Active	2/6/2018	Bernstein Liebhard LLP

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 270).

Pink highlightig Indicates that the case is subject to Defendants' Pending Motion to Dismiss.

Defendants' PFS List 1: Overdue Plaintiff Fact Sheets

(Updated March 09, 2018)

Case Number	Title	Date Filed	Due Date	Comments	Prior Listing	Firm Name
<u>0:17-cv-04889-JNE-FLN</u>	Thornton, Mildred v. 3M Company et al	10/26/2017	1/24/2018	Active	2/6/2018	Bernstein Liebhard LLP
<u>0:17-cv-04891-JNE-FLN</u>	Edwards, Renate v. 3M Company et al	10/26/2017	1/24/2018	Active	2/6/2018	Bernstein Liebhard LLP
<u>0:17-cv-05006-JNE-FLN</u>	Thomas, Michael v. 3M Company et al	11/3/2017	2/1/2018	Active This case is listed on Pacer as Voluntary Dismissal 02/09/2018 Ben wants us to still list this and proceed as normal	2/6/2018	Peterson & Associates, P.C.
<u>0:17-cv-05067-JNE-FLN</u>	Henson, Brenda v. 3M Company et al	11/8/2017	2/6/2018	Active		Kirtland & Packard LLP
<u>0:17-cv-05083-JNE-FLN</u>	Meredith, Benjamin v. 3M Company et al	11/10/2017	2/8/2018	Active		DeGaris
<u>0:17-cv-05112-JNE-FLN</u>	Wygant, Kimberly v. 3M Company et al	11/15/2017	2/11/2018	Active		Davis & Crump, P.C.
<u>0:17-cv-05123-JNE-FLN</u>	Robinson-Bessicks, Alberta v. 3M Company et al	11/15/2017	2/11/2018	Active		Kirtland & Packard LLP
<u>0:17-cv-05187-JNE-FLN</u>	Rashid, Rose v. 3M Company et al	11/21/2017	2/18/2018	Active		DeGaris
<u>0:17-cv-05180-JNE-FLN</u>	Goldberg, Lana v. 3M Company et al	11/21/2017	2/18/2018	Active		Davis & Crump, P.C.
<u>0:17-cv-05203-JNE-FLN</u>	Critchley, Richard v. 3M Company et al	11/22/2017	2/19/2018	Active Duplicate case 17-cv-04377		Kirlland and Packard
<u>0:17-cv-05204-JNE-FLN</u>	Taliaferro, Russell v. 3M Company et al	11/22/2017	2/19/2018	Active		Kirtland and Packard LLP
<u>0:17-cv-05212-JNE-FLN</u>	Casey, Mammie v. 3M Company et al	11/27/2017	2/25/2018	Active		Davis & Crump, P.C.

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 270).

Pink highlightig Indicates that the case is subject to Defendants' Pending Motion to Dismiss.

Defendants' PFS List 1: Overdue Plaintiff Fact Sheets

(Updated March 09, 2018)

Case Number	Title	Date Filed	Due Date	Comments	Prior Listing	Firm Name
<u>0:17-cv-05213-JNE-FLN</u>	Crecy, General v. 3M Company et al	11/27/2017	2/25/2018	Active		Davis & Crump, P.C.
<u>0:17-cv-05260-JNE-FLN</u>	Papez, Constance v. 3M Company et al	11/29/2017	2/27/2018	Active		Davis & Crump, P.C.
<u>0:17-cv-05261-JNE-FLN</u>	Hardy, Alan v. 3M Company et al	11/29/2017	2/27/2018	Active		Bernstein Liebhard LLP
<u>0:17-cv-05270-JNE-FLN</u>	Johnston, Todd v. 3M Company et al	11/29/2017	2/27/2018	Active		Bernstein Liebhard LLP
<u>0:17-cv-05274-JNE-FLN</u>	Capone, Helen v. 3M Company et al	11/29/2017	2/27/2018	Active		Bernstein Liebhard LLP
<u>0:17-cv-05277-JNE-FLN</u>	Billings, Willard v. 3M Company et al	11/29/2017	2/27/2018	Active		Bernstein Liebhard LLP

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 270).

Pink highlightig Indicates that the case is subject to Defendants' Pending Motion to Dismiss.

Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices
(Updated March 09, 2018)

Case Number	Title	1st Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
<u>0:17-cv-03311-JNE-FLN</u>	McDaniel v. 3M Company et al	11/21/2017	12/12/2017	01/10/2018 02/06/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-03445-JNE-FLN</u>	Quinan v. 3M Company et al	11/21/2017	12/12/2017	01/10/2018 02/06/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-03547-JNE-FLN</u>	Sundquist v. 3M Company et al	11/29/2017	12/20/2017	01/10/2018 02/06/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-03666-JNE-FLN</u>	Gallo v. 3M Company et al	12/5/2017	12/26/2017	01/10/2018 02/06/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-03721-JNE-FLN</u>	Ramirez v. 3M Company et al	12/5/2017	12/26/2017	01/10/2018 02/06/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-03809-JNE-FLN</u>	Miller v. 3M Company et al	12/12/2017	1/2/2018	01/10/2018 02/06/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-03834-JNE-FLN</u>	Thornton, Ila v. 3M Company et al	12/13/2017	1/3/2018	01/10/2018 02/06/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-03912-JNE-FLN</u>	Kellett v. 3M Company et al	12/18/2017	1/8/2018	2/6/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-04068-JNE-FLN</u>	Johnson, Barbara v. 3M Company et al	12/27/2017	1/17/2018	2/6/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-04257-JNE-FLN</u>	Coggins, Mark v. 3M Company et al	1/10/2018	1/30/2018	2/6/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-03496-JNE-FLN</u>	Aker, Mary v. 3M Company et al	1/11/2018	1/31/2018		McGlynn, Glisson and Mouton
<u>0:17-cv-04333-JNE-FLN</u>	Carney, Robert et al v. 3M Company et al	1/17/2018	2/7/2018		Gustafson Gluek PLLC
<u>0:17-cv-04336-JNE-FLN</u>	Lister, Ray v. 3M Company et al	1/29/2018	2/19/2018		Kennedy Hodges, L.L.P.
<u>0:17-cv-04537-JNE-FLN</u>	Echard, Audrey et al v. 3M Company et al	1/30/2018	2/20/2018		Gustafson Gluek PLLC
<u>0:17-cv-04623-JNE-FLN</u>	Guobadia, Maxine v. 3M Company et al	2/5/2018	2/26/2018		The Webster Law Firm
Case Number	Title	2nd Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
<u>0:17-cv-01978-JNE-FLN</u>	Strain v. 3M Company et al	11/27/2017	12/18/2017	1/10/2018 02/6/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-02372-JNE-FLN</u>	Hufford v. 3M Company et al	12/6/2017	12/27/2017	1/10/2018 02/6/2018	Gustafson Gluek PLLC
<u>0:17-cv-02581-JNE-FLN</u>	Key v. 3M Company et al	12/18/2017	1/8/2018	1/10/2018 02/6/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-02758-JNE-FLN</u>	Jones v. 3M Company et al	12/27/2017	1/17/2018	2/6/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-02994-JNE-FLN</u>	Ingold v. 3M Company et al	12/29/2017	1/19/2018	2/6/2018	Kennedy Hodges, L.L.P.

Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices
(Updated March 09, 2018)

<u>0:17-cv-03464-JNE-FLN</u>	Witt, Alan v. 3M Company et al	1/12/2018	2/2/2018	2/6/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-03501-JNE-FLN</u>	Smith, Carla v. 3M Company et al	1/16/2018	2/6/2018	2/6/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-03541-JNE-FLN</u>	Chille v. 3M Company et al	1/16/2018	2/6/2018	2/6/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-03543-JNE-FLN</u>	Hughes, James v. 3M Company et al	1/16/2018	2/6/2018	2/6/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-02925-JNE-FLN</u>	Zimmerman, Burl v. 3M Company et al	1/26/2018	2/16/2018		The Olinde Firm, LLC
<u>0:17-cv-03554-JNE-FLN</u>	Cyr, Kevin v. 3M Company et al	2/1/2018	2/22/2018		DeGaris & Rogers, LLC
<u>0:17-cv-03557-JNE-FLN</u>	Crawford, Desiree v. 3M Company et al	1/30/2018	2/20/2018		McSweeney / Langevin
<u>0:17-cv-03563-JNE-FLN</u>	Opperman, Charlene v. 3M Company et al	1/18/2018	2/8/2018		Kennedy Hodges, L.L.P.
<u>0:17-cv-03696-JNE-FLN</u>	Hickman, Alan v. 3M Company et al	1/23/2018	2/13/2018		Kennedy Hodges, L.L.P.
<u>0:17-cv-03718-JNE-FLN</u>	Seymore, Mary v. 3M Company et al	1/23/2018	2/13/2018		Kennedy Hodges, L.L.P.
<u>0:17-cv-03747-JNE-FLN</u>	Jackson, Deloise v. 3M Company et al	1/30/2018	2/20/2018		Schlichter Bogard & Denton, LLP
<u>0:17-cv-03781-JNE-FLN</u>	Buttram, Trude v. 3M Company et al	1/26/2018	2/16/2018		Kennedy Hodges, L.L.P.
<u>0:17-cv-03824-JNE-FLN</u>	Henry, Lawrence v. 3M Company et al	1/30/2018	2/20/2018		Kennedy Hodges, L.L.P.
<u>0:17-cv-03833-JNE-FLN</u>	Boultinghouse, Richard v. 3M Company et al	1/30/2018	2/20/2018		Kennedy Hodges, L.L.P.
<u>0:17-cv-03848-JNE-FLN</u>	Boughner, Roland v. 3M Company et al	2/5/2018	2/26/2018		Kennedy Hodges, L.L.P.
<u>0:17-cv-03851-JNE-FLN</u>	Colby, Mary v. 3M Company et al	2/5/2018	2/26/2018		Kennedy Hodges, L.L.P.
<u>0:17-cv-03859-JNE-FLN</u>	Revenaugh, Mary Katherine v. 3M Company et al	1/30/2018	2/20/2018		Kennedy Hodges, L.L.P.
<u>0:17-cv-03939-JNE-FLN</u>	Winkelman, Chad v. 3M Company et al	2/5/2018	2/26/2018		Kennedy Hodges, L.L.P.
<u>0:17-cv-03963-JNE-FLN</u>	Jones, Rose v. 3M Company et al	2/6/2018	2/27/2018		Kennedy Hodges, L.L.P.
<u>0:17-cv-04432-JNE-FLN</u>	Egdorf, Arlan v. 3M Company	2/7/2018	2/28/2018		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A

Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices
(Updated March 09, 2018)

Case Number	Title	3rd Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
<u>0:17-cv-01968-JNE-FLN</u>	Jordan, Teresa v. 3M Company et al	1/9/2018	1/30/2018	2/6/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-02010-JNE-FLN</u>	Ewing, Tanya v. 3M Company et al	1/12/2018	2/2/2018	2/6/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-02114-JNE-FLN</u>	Harms, Bobby v. 3M Company et al	1/17/2018	2/7/2018		Kennedy Hodges, L.L.P.
<u>0:17-cv-02534-JNE-FLN</u>	Duran, Connie v. 3M Company et al	2/5/2018	2/26/2018		Kennedy Hodges, L.L.P.
<u>0:17-cv-02638-JNE-FLN</u>	Reinker, Susan v. 3M Company et al	2/6/2018	2/27/2018		Kennedy Hodges, L.L.P.

Yellow highlighting indicates that the case was previously listed on one or two status conference agendas per PTO 14 (D.E. 270).
Pink highlighting indicates that the case is subject to Defendants' Pending Motion to Dismiss.

Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response

(Updated March 09, 2018)

[illegible]

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 270).

Pink highlightig Indicates that the case is subject to Defendants' Pending Motion to Dismiss.

EXHIBIT D

From: Ben Hulse

Sent: Friday, April 13, 2018 2:32 PM

To: 'JoanEricksen_Chambers@mnd.uscourts.gov' <JoanEricksen_Chambers@mnd.uscourts.gov>;

'Noel_Chambers@mnd.uscourts.gov' <Noel_Chambers@mnd.uscourts.gov>

Cc: Jerry Blackwell <blackwell@blackwellburke.com>; Bridget Ahmann

<Bridget.Ahmann@FaegreBD.com>; 'gzimmerman@meshbesh.com'

<gzimmerman@meshbesh.com>; 'bgordon@levinlaw.com' <bgordon@levinlaw.com>;

'MVC@ciresiconlin.com' <MVC@ciresiconlin.com>; 'JMC@CiresiConlin.com' <JMC@CiresiConlin.com>;

'David J. Szerlag' <david@pritzkerlaw.com>; 'Wendy Thayer' <wendy@pritzkerlaw.com>

Subject: Bair Hugger, MDL 2666 -- Defendants' lists of PFS disputes for April 2018

Dear Judge Ericksen,

Even though this month's status conference has been cancelled, Defendants would still like to list cases with Plaintiff Fact Sheet disputes, as provided by PTO 14, paragraph 7, Dkt. No. 117.

In the past, the Court ordered that PFS disputes were deemed "addressed to the Court" notwithstanding the cancellation of the in-court conference. (E.g., Dkt. No. 959.) Defendants request the same for this month.

Best regards,

Ben Hulse

Counsel for Defendants

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(Updated April 13, 2018)*

Case Number	Title	Date Filed	Due Date	Prior Listing	Firm Name
0:17-cv-04637-JNE-FLN	Mackey, Carolyn v. 3M Company et al	10/11/2017	1/9/2018	2/6/2018 03/06/2018	Bernstein Liebhard LLP
0:17-cv-04642-JNE-FLN	Smith, Diana et al v. 3M Company et al	10/11/2017	1/9/2018	2/6/2018 03/06/2018	The Miller Firm, LLC
0:17-cv-04651-JNE-FLN	Knight, Kyle v. 3M Company et al	11/29/2017	1/9/2018	2/6/2018 03/06/2018	Kirtland & Packard LLP
0:17-cv-04652-JNE-FLN	Leaf, Loretta v. 3M Company et al	10/11/2017	1/9/2018	2/6/2018 03/06/2018	Kirtland & Packard LLP
0:17-cv-04775-JNE-FLN	Reinhardt, Rhonda v. 3M Company et al	10/23/2017	1/21/2018	2/6/2018 03/06/2018	Bernstein Liebhard LLP
0:17-cv-05302-JNE-FLN	Kelley, Charles v. 3M Company et al	11/30/2017	2/28/2018		Kitland & Packard, LLP
0:17-cv-05318-JNE-FLN	Wilkinson, Deborah v. 3M Company et al	12/1/2018	3/10/2018		Kennedy Hodges, LLP
0:17-cv-05342-JNE-FLN	Bozeman, Lynda v. 3M Company et al	12/4/2017	3/4/2018		Kennedy Hodges, L.L.P.
0:17-cv-05348-JNE-FLN	Wilmer, Roxanne v. 3M Company et al	12/5/2017	3/5/2018		Schlichter Bogard & Denton, LLP
0:17-cv-05375-JNE-FLN	Lewis, Ronnie v. 3M Company et al	12/7/2017	3/7/2018		Davis & Crump, P.C.
0:17-cv-05458-JNE-FLN	Lake, Herbert v. 3M Company et al	12/15/2017	3/15/2018		Kirtland & Packard LLP
0:17-cv-05469-JNE-FLN	Minnigan-Judd, Stephanie v. 3M Company et al	12/18/2017	3/18/2018		The Law offices of Travis R. Walker, P.A.
0:17-cv-05472-JNE-FLN	Jones, Denise v. 3M Company et al	12/18/2017	3/18/2018		Johnson Becker, PLLC
0:17-cv-05477-JNE-FLN	Shepard, Andrew v. 3M Company et al	12/18/2017	3/18/2018		Johnson Becker, PLLC
*On April 12, Plaintiffs' counsel alerted Defendants that PFSs in forty cases, going back to 2016, had not been properly served in the portal. These PFSs were loaded onto the portal on April 11, 2018, but show prior (failed) upload dates. Defendants have made every effort to incorporate these PFSs in the current lists, but some of these PFSs may not be reflected.					

Case Number	Title	Date Filed	Due Date	Prior Listing	Firm Name
<u>0:17-cv-05496-JNE-FLN</u>	Copeland, Donna v. 3M Company et al	12/19/2017	3/19/2018		Kirtland & Packard LLP
<u>0:17-cv-05506-JNE-FLN</u>	Hernandez, William v. 3M Company et al	12/20/2017	3/20/2018		Kirtland & Packard LLP
<u>0:17-cv-05513-JNE-FLN</u>	Woodman, Donna v. 3M Company et al	12/20/2017	3/20/2018		Kirtland & Packard LLP
<u>0:17-cv-05514-JNE-FLN</u>	Jones, James v. 3M Company et al	12/20/2017	3/20/2018		Kirtland & Packard LLP
<u>0:17-cv-05515-JNE-FLN</u>	Gates, Kathy v. 3M Company et al	12/20/2017	3/20/2018		Kirtland & Packard LLP
<u>0:17-cv-05547-JNE-FLN</u>	Scull, Michael v. 3M Company et al	12/22/2017	3/22/2018		Davis & Crump, P.C.
<u>0:17-cv-05550-JNE-FLN</u>	Bishop, Alma v. 3M Company et al	12/22/2017	3/22/2018		Davis & Crump, P.C.
<u>0:18-cv-00032-JNE-FLN</u>	DeArman, Lori v. 3M Company et al	1/4/2018	4/4/2018		Kirtland & Packard LLP
<u>0:18-cv-00036-JNE-FLN</u>	Odom, Sandra v. 3M Company et al	1/5/2018	4/5/2018		Davis & Crump, P.C.
<u>0:18-cv-00063-JNE-FLN</u>	Morgan, Zachary v. 3M Company et al	1/9/2018	4/9/2018		Johnson Becker, PLLC
<u>0:18-cv-00064-JNE-FLN</u>	Garvin, Leah v. 3M Company et al	1/9/2018	4/9/2018		Johnson Becker, PLLC
<u>0:18-cv-00067-JNE-FLN</u>	Carlson, Glenn v. 3M Company et al	1/9/2018	4/9/2018		Johnson Becker, PLLC

Case Number	Title	1st Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
<u>0:17-cv-04068-JNE-FLN</u>	Johnson, Barbara v. 3M Company et al	12/27/2017	1/17/2018	2/6/2018 03/09/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-03311-JNE-FLN</u>	McDaniel v. 3M Company et al	11/21/2017	12/12/2017	01/10/2018 02/06/2018 03/09/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-03496-JNE-FLN</u>	Aker, Mary v. 3M Company et al	1/11/2018	2/2/2018	3/9/2018	McGlynn, Glisson and Mouton
<u>0:17-cv-03547-JNE-FLN</u>	Sundquist v. 3M Company et al	11/29/2017	12/20/2017	01/10/2018 02/06/2018 03/09/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-03809-JNE-FLN</u>	Miller v. 3M Company et al	12/12/2017	1/2/2018	01/10/2018 02/06/2018 03/09/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-04537-JNE-FLN</u>	Echard, Audrey et al v. 3M Company et al	1/30/2018	2/20/2018	3/9/2018	Gustafson Gluek PLLC
<u>0:17-cv-04623-JNE-FLN</u>	Guobadia, Maxine v. 3M Company et al	2/5/2018	2/26/2018	3/9/2018	The Webster Law Firm
<u>0:17-cv-04302-JNE-FLN</u>	Tilley, William v. 3M Company et al	2/7/2018	2/28/2018		The Olinde Firm, LLC
<u>0:17-cv-04375-JNE-FLN</u>	Baker, David v. 3M Company et al	2/14/2018	3/7/2018		Bernstein Liebhard LLP
<u>0:17-cv-04429-JNE-FLN</u>	Holcomb, April v. 3M Company et al	2/7/2018	2/28/2018		DeGaris & Rogers, LLC
<u>0:17-cv-04512-JNE-FLN</u>	Cunningham, Mary v. 3M Company et al	2/12/2018	3/5/2018		Bernstein Liebhard LLP
<u>0:17-cv-04716-JNE-FLN</u>	Bewley, Kenneth v. 3M Company et al	3/13/2018	4/3/2018		Kirtland and Packard LLP
<u>0:17-cv-04857-JNE-FLN</u>	Murphy, Bennie v 3M et al	3/19/2018	4/9/2018		Bernstein Liebhard LLP
<u>0:17-cv-04877-JNE-FLN</u>	McDonald, Ethel v 3M et al	2/21/2018	3/14/2018		Bernstein Liebhard LLP
<u>0:17-cv-04896-JNE-FLN</u>	Pew, Richard v. 3M Company et al	3/13/2018	4/3/2018		Kirtland & Packard LLP
<u>0:17-cv-04984-JNE-FLN</u>	Cheney, Jay v. 3M Company et al	3/12/2018	4/2/2018		Kirtland & Packard LLP
<u>0:17-cv-05021-JNE-FLN</u>	Fair, Randy v. 3M Company et al	3/8/2018	3/29/2018		Kirtland & Packard LLP

served in the portal. These PFSs were loaded onto the portal on April 11, 2018, but show prior (failed) upload dates. Defendants have made every effort to incorporate these PFSs in the current lists, but some of these PFSs may not be reflected.

<u>0:17-cv-05135-JNE-FLN</u>	Carrell, Silas v. 3M Company et al	3/13/2018	4/3/2018		Kennedy Hodges, L.L.P.
<u>0:17-cv-05138-JNE-FLN</u>	Johnson, Hannah v. 3M Company et al	3/13/2018	4/3/2018		Kennedy Hodges, L.L.P.
<u>0:17-cv-05140-JNE-FLN</u>	Green, Rosemary v. 3M Company et al	3/13/2018	4/3/2018		Kennedy Hodges, L.L.P.
<u>0:17-cv-05199-JNE-FLN</u>	Spry, John et al v. 3M Company et al	3/15/2018	4/5/2018		Pendley, Baudin & Coffin L.L.P.
<u>0:17-cv-05202-JNE-FLN</u>	Reed, Tommy et al v. 3M Company et al	3/19/2018	4/9/2018		Pendley, Baudin & Coffin L.L.P.
Case Number	Title	2nd Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
<u>0:17-cv-02372-JNE-FLN</u>	Hufford v. 3M Company et al	12/6/2017	12/27/2017	01/10/2018 02/06/2018 03/09/2018	Gustafson Gluek PLLC
<u>0:17-cv-02758-JNE-FLN</u>	Jones v. 3M Company et al	12/27/2017	1/17/2018	2/6/2018 03/09/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-03543-JNE-FLN</u>	Hughes, James v. 3M Company et al	1/16/2018	2/6/2018	2/6/2018 03/09/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-03747-JNE-FLN</u>	Jackson, Deloise v. 3M Company et al	1/30/2018	2/20/2018	3/9/2018	Schlichter Bogard & Denton, LLP
<u>0:17-cv-03781-JNE-FLN</u>	Buttram, Trude v. 3M Company et al	1/26/2018	2/16/2018	3/9/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-03824-JNE-FLN</u>	Henry, Lawrence v. 3M Company et al	1/30/2018	2/20/2018	3/9/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-03848-JNE-FLN</u>	Boughner, Roland v. 3M Company et al	2/5/2018	2/26/2018	3/9/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-03963-JNE-FLN</u>	Jones, Rose v. 3M Company et al	2/6/2018	2/27/2018	3/9/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-04432-JNE-FLN</u>	Egendorf, Arlan v. 3M Company	2/7/2018	2/28/2018	3/9/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
Case Number	Title	3rd Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
<u>0:17-cv-01968-JNE-FLN</u>	Jordan, Teresa v. 3M Company et al	1/9/2018	1/30/2018	2/6/2018 03/09/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-02114-JNE-FLN</u>	Harms, Bobby v. 3M Company et al	1/17/2018	2/7/2018	3/9/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-02534-JNE-FLN</u>	Duran, Connie v. 3M Company et al	2/5/2018	2/26/2018	3/9/2018	Kennedy Hodges, L.L.P.

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 270).
 Pink highlighting indicates that the case is subject to Defendants' Pending Motion to Dismiss.

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 Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices
 (Updated April 13, 2018)*

0:17-cv-03022-JNE-FLN	Hoyos, Teresa v. 3M Company et al	2/14/2018	03/07/018		Brown and Crouppen, P.C
0:17-cv-03806-JNE-FLN	Barker, Dennis v. 3M Company et al	3/19/2018	4/9/2018		Kennedy Hodges, L.L.P.

Yellow highlighting indicates that the case was previously listed on one or two status conference agendas per PTO 14 (D.E. 270).

Pink highlighting indicates that the case is subject to Defendants' Pending Motion to Dismiss.

Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response

(Updated April 13, 2018)*

Case Number	Title	3rd Deficiency Sent	Prior Listing	Firm Name
<u>0:17-cv-00288-JNE-FLN</u>	Bradford, Linda v. 3M Company et al	9/29/2017	02/06/2018 03/06/2018	The Law offices of Travis R. Walker, P.A.
<u>0:17-cv-01476-JNE-FLN</u>	Behney, Virginia v. 3M Company et al	12/6/2017	02/06/2018 03/06/2018	Kennedy Hodges, L.L.P.
<u>0:17-cv-01554-JNE-FLN</u>	Dorsey, Alma v. 3M Company	11/29/2017	02/06/2018 03/06/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
<u>0:17-cv-01565-JNE-FLN</u>	Little, Arlene v. 3M Company	11/29/2017	02/06/2018 03/06/2018	Levin, Papantonio, Thomas, Mitchell, Rafferty, & Proctor, P.A.
<u>0:17-cv-01093-JNE-FLN</u>	Galbreath et al v. 3M Company et al	12/11/2017	02/06/2018 03/06/2018	Brown and Crouppen, P.C
<u>0:17-cv-02949-JNE-FLN</u>	Jelks, Venice v. 3M Company et al	12/11/2017	01/10/2018 02/06/2018 03/06/2018	Brown and Crouppen, P.C.
<u>0:17-cv-02959-JNE-FLN</u>	Josephs, Robert v. 3M Company et al	12/11/2017	01/10/2018 02/06/2018 03/06/2018	Brown and Crouppen, P.C.
<u>0:17-cv-02737-JNE-FLN</u>	Witherspoon, Richard v. 3M Company et al	1/16/2018	02/06/2018 03/06/2018	Brown and Crouppen, P.C
<u>0:17-cv-01494-JNE-FLN</u>	Six, John v. 3M Company et al	2/2/2018	3/6/2018	Hendrickson Law
<u>0:16-cv-00787-JNE-FLN</u>	Abrams v. 3M Company et al	4/19/2017		Thering & Associates, PLLC
<u>0:16-cv-03618-JNE-FLN</u>	Messner-Katzer v. 3M Company et al	5/22/2017		Capretz & Associates
<u>0:17-cv-02230-JNE-FLN</u>	Johnson, Buddy v. 3M Company et al	2/14/2018		Capretz & Associates
<u>0:17-cv-02251-JNE-FLN</u>	Brewer, Donna v. 3M Company et al	2/14/2018		Capretz & Associates
<u>0:17-cv-02288-JNE-FLN</u>	Anderson, Ruth et al v. 3M Company et al	2/7/2018		Brent Coon & Associates
<u>0:17-cv-02638-JNE-FLN</u>	Reinker, Susan v. 3M Company et al	2/6/2018		Kennedy Hodges, L.L.P
<u>0:17-cv-02901-JNE-FLN</u>	Moore, Michael v. 3M Company et al	2/14/2018		Kennedy Hodges, L.L.P.
<u>0:17-cv-03049-JNE-FLN</u>	Finney, Gwendolyn v. 3M Company et al	2/14/2018		Brown and Crouppen, P.C

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Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response

(Updated April 13, 2018)*

Case Number	Title	3rd Deficiency Sent	Prior Listing	Firm Name
<u>0:17-cv-03055-JNE-FLN</u>	Harper, Joel et al v. 3M Company et al	2/12/2018		Schlichter Bogard & Denton, LLP
<u>0:17-cv-03162-JNE-FLN</u>	Zamora, Arturo Jr. v. 3M Company et al	3/8/2018		Brown and Crouppen, P.C
<u>0:17-cv-03166-JNE-FLN</u>	Howard, Roberta v. 3M Company et al	2/14/2018		Brown and Crouppen, P.C.
<u>0:17-cv-03255-JNE-FLN</u>	Holmes, Peter et al v. 3M Company et al	2/21/2018		Brown and Crouppen, P.C.
<u>0:17-cv-03276-JNE-FLN</u>	Andrews, Larry (Price, Summer) v. 3M Company et al	2/28/2017		Brown and Crouppen, P.C.
<u>0:17-cv-03294-JNE-FLN</u>	Hawkins, William v. 3M Company et al	2/14/2018		Brown and Crouppen, P.C.
<u>0:17-cv-03305-JNE-FLN</u>	Brainerd, Jeremiah et al v. 3M Company et al	2/26/2018		Brown and Crouppen, P.C.
<u>0:17-cv-03533-JNE-FLN</u>	Holcomb, Virginia v. 3M Company et al	2/14/2018		Brown and Crouppen, P.C.
<u>0:17-cv-03535-JNE-FLN</u>	Finn, Keith et al v. 3M Company et al	2/20/2018		Brown and Crouppen, P.C.
<u>0:17-cv-03662-JNE-FLN</u>	Guyton, Sharida v. 3M Company et al	2/21/2018		Brown and Crouppen, P.C
<u>0:17-cv-03788-JNE-FLN</u>	Delena, Cheryl et al v. 3M Company et al	2/28/2017		Meyerkord & Meyerkord, LLC
<u>0:17-cv-04805-JNE-FLN</u>	Beck, Louis v. 3M Company et al	2/28/2017		Brown and Crouppen, P.C.
<u>0:17-cv-04825-JNE-FLN</u>	Duckworth, Laura v. 3M Company et al	2/20/2018		Brown and Crouppen, P.C.
<u>0:17-cv-04869-JNE-FLN</u>	Piscopo, Joseph v. 3M Company et al	2/20/2018		Brown and Crouppen, P.C.
<u>0:17-cv-04880-JNE-FLN</u>	Scott, Sheree v. 3M Company et al	2/28/2017		Brown and Crouppen, P.C.
<u>0:17-cv-04892-JNE-FLN</u>	Thyrion, Leslie v. 3M Company et al	3/7/2018		Brown and Crouppen, P.C.
<u>0:17-cv-04934-JNE-FLN</u>	Hall, Martha v. 3M Company et al	2/27/2018		Justinian & Associates PLLC

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